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**From:** paul beiklaw.com <paul@beiklaw.com>  
**Sent:** Friday, October 30, 2020 3:16 PM  
**To:** Harris, Marion R.  
**Cc:** Finguerra-DuCharme, Dyan; Klarberg, Ryan S.; 'Tom Adair'  
**Subject:** Morgans v Oxberry

Marion,

The Court's order requires my client's review and to segregate document production into relevant and irrelevant groups and to furnish those groupings by November 1 (Sunday). My client cannot complete this project by Sunday and needs to move for an extension of time of ten days. The client had many issues with the original vendor who did the search and moved on from that vendor. The client hired another vendor to work on the project. The project is significant (over 30,000 items) and has doubled in size due to a new vendor searching additional sources of information (using the agreed search terms and ESI protocols). For certificate of conference, does your client oppose the motion? Would you be available to confer this afternoon?

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